

EXHIBIT H

Canfield, Donna (Law)

From: Canfield, Donna (Law)
Sent: Wednesday, April 21, 2021 9:01 AM
To: 'John W. Moscow'
Cc: 'Louis C La Pietra Esq'; Diane Camacho
Subject: RE: Scheduling
Attachments: D000678-D000697 - (# Legal 11702392).PDF

My name is Donna Canfield.

Yes, please provide dates.

Attached is the RFP. I do not know if we have the PWC reports, but I will make an inquiry.

Yes, we do. And we also need to schedule the depositions of the named defendants, which you have failed to do.

Please send formal notices of deposition as required by the federal rules.

Of course, but it takes time to go through the documents.

All material redacted is non-responsive. I see no reason to review the redactions, unless you have some basis that you can articulate.

I was served with the subpoena after the fact. I believe pursuant to the federal rules, you are required to serve a party prior to subpoenaing a non-party. We will be providing limited scope representation for Assemblyman Simcha Ehrenstein. As he is represented by this office, he is to be contacted through me. I will let you know later today when he is available for deposition.

I will be generally unavailable by telephone for the remainder of the week. Please send any additional inquiries by email.

Thank you.

From: John W. Moscow [mailto:John.Moscow@LBKMLAW.com]
Sent: Wednesday, April 21, 2021 8:08 AM
To: Canfield, Donna (Law)
Cc: 'Louis C La Pietra Esq'; Diane Camacho
Subject: FW: Scheduling

Diane Canfield
Assistant Corporation Counsel
Re: Jaffe v. City of New York

We have depositions to complete---Linder, Spinella.

You told me that you would get me the RFP by which PWC obtained a contract to work on neighborhood policing, including personnel. We also need the PWC reports. Could you please produce those.

We need to reschedule the deposition of plaintiff which you cancelled.

We will need to Schedule the depositions of B, FLONYC, First Deputy Mayor Dean Fulehan, and the then (January 2018) Chief of Staff to the Mayor

We need documents produced. You say that you are reviewing 65,000 documents, but do not say when we will get to see them. I would like to have them in time to review them before we depose defendants O'Neill and Tucker. Is it the case that Tucker generated no emails in connection with the decisions to fire four long time colleagues and to keep Secreto, Chan, and Boyce.?

You, Lou, and I need to review the apparent redactions in your most recent production.

We have subpoenaed Assemblyman Simcha Ehrenstein to testify next Monday at 10 a.m. You have been sent a copy of the subpoena. You will be copied on future subpoenas as well.

John Moscow
917-693-2265

Please note that the personnel of Lewis Baach Kaufmann Middlemiss are working remotely at this time due to the COVID-19 outbreak. Our personnel have secure remote access to our systems and software to perform essential functions so that we can continue to be responsive to clients and minimize any disruptions. You may continue to contact any of us through normal channels – telephone or email.